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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

VERONICA MCLEOD, individually and as
successor in interest to decedent, DOLORES
HERNANDEZ; AMADO HERNANDEZ,
individually and as successor in interest to
decedent, DOLORES HERNANDEZ; and
YSIDRA REGALDO, individually,

Plaintiffs,

vs.

CITY OF REDDING; GARRETT
MAXWELL, an individual; MATTHEW
BRUCE, an individual; and DOES 2-10,
inclusive,

Defendants.

Case No. 2:22-cv-00585-WBS-JDP

Honorable William B. Shubb

**PLAINTIFFS' PROPOSED VERDICT
FORM (LIABILITY)**

Trial: September 10, 2024

**TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF
RECORD:**

Plaintiffs VERONICA MCLEOD, individually and as successor in interest to decedent,
DOLORES HERNANDEZ and AMADO HERNANDEZ, individually and as successor in interest
to decedent, DOLORES HERNANDEZ (“Plaintiffs”) hereby submit their Proposed Verdict Form
(Liability) pursuant to the Court’s July 3, 2024, Final Pretrial Order.

Respectfully submitted,

DATED: August 20, 2024

**LAW OFFICES OF DALE K. GALIPO
LAW OFFICE OF STEWART KATZ**

By /s/ Hang D. Le

Dale K. Galipo

Stewart Katz

Hang D. Le

Attorneys for Plaintiffs

VERONICA MCLEOD, AMADO HERNANDEZ,
and YSIDRA REGALDO

QUESTION 1: Did any of the following officers unreasonably detain or arrest Dolores Hernandez?

Garret Maxwell	YES _____	NO _____
Matthew Bruce	YES _____	NO _____

Please proceed to Question 2.

QUESTION 2: Did any of the following officers use unreasonable force against Dolores Hernandez?

Garret Maxwell	YES _____	NO _____
Matthew Bruce	YES _____	NO _____

If you answered “Yes” to any defendant in Question 2, please proceed to answer Question 3 for that defendant.

If you answered “No” to all defendants and uses of force in Question 2, please skip Question 3 and proceed to Question 4.

QUESTION 3: Was the use of unreasonable force a cause of Dolores Hernandez’s harm, damage, injury, or loss?

Garret Maxwell	YES _____	NO _____
Matthew Bruce	YES _____	NO _____

Please answer Question 4.

QUESTION 4: Were any of the involved City of Redding police officers negligent towards Dolores Hernandez?

YES _____ NO _____

If you answered "yes" to Question 4, please proceed to Question 5.

If you answered "no" to all defendants in Question 1 and "no" to all defendants in Question 2 or 3, and "no" to Question 4, please sign and return this form.

QUESTION 5: Was the negligence of any of the involved City of Redding police officers a cause of Dolores Hernandez's injury or harm?

YES _____ NO _____

Please proceed to the next question.

QUESTION 6: Was Dolores Hernandez negligent?

YES _____ NO _____

If you answered "yes" to Question 6, please proceed to Question 7.

If you answered "no" to Question 6, please skip Questions 7-8 and proceed to Question 9.

QUESTION 7: Was Dolores Hernandez's negligence a cause of her injury or harm?

YES _____ NO _____

If you answered "yes" to Question 7, please proceed to Question 8.

If you answered "no" to Question 7, please proceed to Question 9.

QUESTION 8: What percentage of responsibility for Dolores Hernandez do you assign to the negligent conduct, if any, of the following?

City of Redding Police Officer(s)	_____ %
Dolores Hernandez	_____ %
TOTAL	100 %

If you answered "yes" to any defendant for Question 1, or "yes" to any defendant for Questions 2 and 3, please proceed to answer Question 9.

If you answered "no" to all defendants in Questions 1, 2, and 3, please sign and return the form.

QUESTION 9: Did any of the involved City of Redding police officers act with a reckless disregard for Dolores Hernandez's constitutional right to be free from unreasonable detention, arrest, or force?

YES _____ NO _____

If you answered "yes" to any defendant for Question 1, or "yes" to any defendant for Questions 2 and 3, or "yes" to Question 9, please proceed to answer Question 10.

If you answered "no" to all defendants in Questions 1, 2, 3, and "no" to Question 9, please sign and return the form.

QUESTION 10: Was the conduct of any of the following officers malicious, oppressive, or in reckless disregard of Dolores Hernandez's rights?

Garret Maxwell YES _____ NO _____

Matthew Bruce YES _____ NO _____

Please sign and date this verdict form and return it to the Court.

Dated: _____ Signed: _____

Jury Foreperson